

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

VIVIAN BERT, et al.,	:	Case No. C-1-02-467
	:	
Plaintiffs,	:	Judge Beckwith
	:	Magistrate Judge Hogan
vs.	:	
	:	<b>JOINT MOTION FOR</b>
AK STEEL CORPORATION,	:	<b><u>EXTENSION OF DEADLINES</u></b>
	:	
Defendant.	:	

The parties jointly file this motion and respectfully request that this Court extend the following deadlines in this matter. The current scheduling order provides the following deadlines:

Plaintiffs' expert report: March 1, 2005.

Defendant's expert report: March 29, 2005.

Plaintiffs' expert reply: April 29, 2005.

Class discovery deadline: May 23, 2005.

Motion for class certification: June 7, 2005.

On March 1, 2005, this Court ordered AK Steel to produce documents relating to hiring activity dating from September, 2002 to the present. AK Steel has just completed the process of gathering and providing this additional production, consisting of approximately 30,000 pages of employment applications and associated documents, to the Plaintiffs. These documents had neither been previously imaged nor coded for inclusion in a data base.

On March 1, 2005, pursuant to the Court's present scheduling order, Plaintiffs' expert served his report on the Defendant. In view of the new document production, Plaintiffs' expert will need to review and analyze the additional documents recently provided by the Defendant,

code the relevant documents into his data base, and then determine their effect on his original analysis. At that point, it is anticipated by the parties that Plaintiffs' expert will need to supplement his initial report.

If the current schedule is not altered, the Defendant's expert will have filed her rebuttal report prior to the time that Plaintiffs' expert will be able to prepare his supplemental report. The end result will be that multiple initial expert reports, multiple rebuttal reports, and multiple reply reports will be served.

The parties believe that a change in the current calendar is necessary in order to minimize additional expense and confusion and to avoid the creation of piecemeal expert reports. The parties therefore respectfully request that this Court amend the current schedule as set forth below:

Plaintiffs' amended expert report: April 18, 2005.

Defendant's expert report: May 18, 2005.

Plaintiffs' expert reply: June 17, 2005.

Discovery deadline: August 1, 2005.

Motion for class certification: August 15, 2005.

To reiterate, the delays now requested are solely the result of the aforementioned additional discovery ordered by the Court. The parties do not now anticipate that any further delays will be necessitated in this matter.

Respectfully submitted,

s/ Gregory Parker Rogers

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